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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91219109
Party	Plaintiff Monster Energy Company
Correspondence Address	JONATHAN MENKES KNOBBE MARTENS OLSON & BEAR LLP 2040 MAIN STREET , 14TH FLOOR IRVINE, CA 92614 UNITED STATES efiling@knobbe.com, francie.leonguerrero@knobbe.com
Submission	Motion to Extend
Filer's Name	Jonathan Menkes
Filer's e-mail	efiling@knobbe.com, francie.leonguerrero@knobbe.com, doreen.buluran@knobbe.com
Signature	/Jonathan Menkes/
Date	07/30/2015
Attachments	2015-07-30 MTN TO EXT ANSWER WITH CONSENT-HAN-BEV.2756M.pdf(73868 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

MONSTER ENERGY COMPANY,

Opposer,

v.

CUTTWOOD, LLC,

Applicant.

)
) Opposition No.: 91219109
)
) Serial No.: 86/255599
)
) Mark: MONSTER MELONS
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MOTION FOR EXTENSION OF ANSWER DISCOVERY
OR TRIAL PERIODS WITH CONSENT

Commissioner for Trademarks
 P.O. Box 1451
 Alexandria, VA 22313-1451

Dear Sir or Madam:

Pursuant to C.F.R. § 2.120(a)(2), Opposer, Monster Energy Company, hereby moves that the deadline for Applicant, Cuttwood, LLC, to file its Answer and be extended 30 days until September 4, 2015 in the above-referenced opposition proceeding, and all subsequent dates set in this case be extended accordingly.

The proposed dates are as follows:

Time to Answer	September 4, 2015
Deadline for Discovery Conference	October 4, 2015
Discovery Opens	October 4, 2015
Initial Disclosures Due	November 3, 2015
Expert Disclosures Due	March 2, 2016

Discovery Period to Close	April 1, 2016
Plaintiff's Pretrial Disclosures due	May 16, 2016
Plaintiff's 30-day Trial Period Ends	June 30, 2016
Defendant's Pretrial Disclosures	July 15, 2016
Defendant's 30-day Trial Period Ends	August 29, 2016
Plaintiff's Rebuttal Disclosures	September 13, 2016
Plaintiff's 15-day Rebuttal Period Ends	October 13, 2016

This motion is not for purposes of delay but to allow the parties to continue settlement negotiations. Applicant's counsel, Justin H. Aida, consented to this extension via telephone on July 30, 2015.

The parties are confident the short extension will help avoid unnecessary costs associated with discovery, pre-trial motion practice, and testimony, and could avert costs to the Board as well. Moreover, the Motion is stipulated between all parties, which indicates neither party will be prejudiced by any delay associated with the suspension. In light of the foregoing, Opposer respectfully moves that the Board extend all deadlines for a period of 30 days.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: 7/30/2015

By: /Jonathan Menkes/
Steven J. Nataupsky
Diane M. Reed
Jonathan A. Menkes
2040 Main Street
Fourteenth Floor
Irvine, CA 92614
(949) 760-0404
Attorneys for Opposer
Monster Energy Company

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing **MOTION FOR
EXTENSION OF ANSWER DISCOVERY OR TRIAL PERIODS WITH CONSENT** has
been served on Applicant's attorney of record on July 30, 2015 via electronic mail:

Nicholas D. Myers
MYERS BERSTEIN LLP
2 Executive Circle, Suite 205
Irvine, CA 92614
Nicholas@mybelaw.com

Justin H. Aida
GORDON & REES LLP
2211 Michelson Drive, Suite 400
Irvine, CA 92612
jaida@gordonrees.com

Signature: 

Name: Doreen P. Buluran

Date: July 30, 2015